

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net

*Attorneys for Plaintiff, U.S. Bank National Association as Trustee for Terwin Mortgage Trust
2004-13 ALT, Asset-Backed Certificates, TMTS Series 2004-13ALT*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 U.S. BANK NATIONAL ASSOCIATION AS
11 TRUSTEE FOR TERWIN MORTGAGE
12 TRUST 2004-13 ALT, ASSET-BACKED
13 CERTIFICATES, TMTS SERIES 2004-
14 13ALT,

Plaintiff,

vs.

15 FIDELITY NATIONAL TITLE GROUP,
16 INC.; CHICAGO TITLE INSURANCE
17 COMPANY; TICOR TITLE OF NEVADA,
18 INC.; DOE INDIVIDUALS I through X; and
19 ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 2:20-cv-02239-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
18-20]**

[First Request]

21 Plaintiff, U.S. Bank National Association as Trustee for Terwin Mortgage Trust 2004-13
22 ALT, Asset-Backed Certificates, TMTS Series 2004-13ALT (“U.S. Bank”), Specially-
23 Appearing Defendant Fidelity National Title Group, Inc. (“Fidelity”), and Defendants Chicago
24 Title Insurance Company (“Chicago Title”), and Ticor Title of Nevada, Inc. (“Ticor”,
25 collectively “Defendants”), by and through their counsel of record, hereby stipulate and agree as
26 follows:

- 27 1. On December 9, 2020, U.S. Bank filed its Complaint in Eighth Judicial District
28 Court, Case No. A-20-826129-C [ECF No. 1-1];

2. On December 10, 2020, Chicago Title filed its Petition for Removal to this Court [ECF No. 1];
3. On January 25, 2021, Chicago Title filed a Motion to Dismiss [ECF No. 18];
4. On January 25, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 19];
5. On January 25, 2021, Ticor also filed a Motion to Dismiss [ECF No. 20];
6. U.S. Bank's deadline to respond to Defendants' Motions to Dismiss is currently February 8, 2021;
7. U.S. Bank's counsel is requesting an extension until March 10, 2021, to file its response to the pending Motions to Dismiss;
8. This extension is requested to allow U.S. Bank additional time to finalize and file its response to the pending Motions to Dismiss as lead handling counsel for U.S. Bank continues to recover from an unexpected medical emergency.
9. Counsel for Defendants does not oppose the requested extension;

///

///

///

///

///

///

///

///

1 10. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 8th day of February, 2021.

 DATED this 8th day of February, 2021.

5 WRIGHT, FINLAY & ZAK, LLP

 SINCLAIR BRAUN LLP

6 /s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

7 Lindsay D. Robbins, Esq.

 Kevin S. Sinclair, Esq.

8 Nevada Bar No. 13474

 Nevada Bar No. 12277

9 7785 W. Sahara Ave., Suite 200

 16501 Ventura Boulevard, Suite 400

 Las Vegas, NV 89117

 Encino, California 91436

10 Attorneys for Plaintiff, U.S. Bank National

 Attorney for Defendants, Fidelity National

11 Association as Trustee for Terwin Mortgage

 Title Group, Inc., Fidelity National Title

 Trust 2004-13 ALT, Asset-Backed

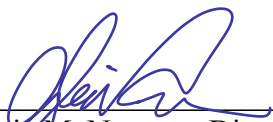
 Insurance Company, and Ticor Title of

 Certificates, TMTS Series 2004-13ALT

 Nevada, Inc.

12
13
14 **IT IS SO ORDERED.**

15 Dated this 8 day of February, 2021

16
17
18 
19 _____
20 Gloria M. Navarro, District Judge
21 UNITED STATES DISTRICT COURT
22
23
24
25
26
27
28